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August 11, 2022

**VIA ECF**

Hon. Jesse M. Furman  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 1105  
New York, NY 10007

Re: *Pasquarello v. Crothall Health Care, Inc., et al.*, Case No. 21-cv-08732-JMF

Dear Judge Furman:

Pursuant to the case management plan in this case, the Parties submit the following information in advance of the August 16, 2022 Conference:

**(1) A Statement of all Existing Deadlines**

Discovery is complete, with the exception of one deposition, which the Parties have agreed—with Your Honor’s permission—shall take place sometime before trial. This was due to the witness’ medical condition and current unavailability.

**(2) A Brief Discussion of any Outstanding Motions**

There are no outstanding motions.

**(3) A Brief Discussion of the Status Discovery**

See Section 1 of this letter.

**(4) & (5). Settlement Discussions**

The Parties attended a half-day mediation in March of 2022. That mediation was unsuccessful. Plaintiff made a revised settlement demand on July 8, 2022. The Parties do not believe that a settlement conference would be useful at this point, given the straightforward communications regarding settlement to this point.

**(6) Anticipated Length of Trial/Jury**

The Parties anticipate trial will last 3-4 days. The case will be tried by a jury.

**(7) Summary Judgment Motions**

Plaintiff will not move for summary judgment. Defendants intend to move for summary judgment and request that the deadline to file Defendants' motion to be extended to October 4, 2022, which is 30 days from the current deadline. Defendants also request that Plaintiff's opposition be submitted by November 1, 2022 and that Defendants' reply be submitted by November 15, 2022.

Dated: August 11, 2022  
New York, NY

Respectfully submitted,

LITTLER MENDELSON P.C.

By: /s/ Zack Sharpe  
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